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13 MEDIANEWS GROUP, INC. and
14 CALIFORNIA NEWSPAPERS PARTNERSHIP

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 CLINTON REILLY,

20 Plaintiff,

21 v.

22 MEDIANEWS GROUP, INC.; THE
HEARST CORPORATION; STEPHENS
23 GROUP INC.; GANNETT CO., INC.; and
CALIFORNIA NEWSPAPERS
24 PARTNERSHIP,

25 Defendants.

Case No. 06-CV-04332-SI

[Complaint Filed: July 14, 2006]

STIPULATION AND [PROPOSED]
ORDER CONCERNING DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
REGARDING PLAINTIFF'S STANDING

Judge: Hon. Susan Illston

Trial Date: April 30, 2007

1 WHEREAS, Defendants MediaNews Group, Inc., The Hearst Corporation,
2 Stephens Group, Inc., Gannett Co., Inc. and California Newspapers Partnership
3 (collectively, "Defendants") intend to file a motion for summary judgment and/or partial
4 summary judgment challenging Plaintiff Clinton Reilly's standing to bring this action, and
5 seek to have that motion resolved prior to the scheduled commencement of trial in this
6 action;

7 WHEREAS, the parties have met and conferred regarding Defendants'
8 standing motion and agreed to an expedited briefing and hearing schedule, subject to the
9 Court's approval and availability;

10 NOW THEREFORE, the parties hereby stipulate and agree to the following
11 schedule with respect to Defendants' standing motion:

- 12 1. Defendants shall file and serve their moving papers by March 16, 2007.
- 13 2. Plaintiff shall file and serve his opposition papers by March 23, 2007.
- 14 3. Defendants shall file and serve their reply papers by March 30, 2007.
- 15 4. The hearing on Defendants' standing motion shall be April 6 at 3:30 p.m.

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17 IT IS SO STIPULATED.

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19 Dated: March 7, 2007

20 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
21 KING & BALLOW

22
23 By

/S/

24 MICHAEL W. SCARBOROUGH

25 Attorneys for Defendants
26 MEDIANEWS GROUP, INC. and
27 CALIFORNIA NEWSPAPERS PARTNERSHIP

1 Dated: March 7, 2007

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Attorneys for Defendant
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12 Dated: March 7, 2007

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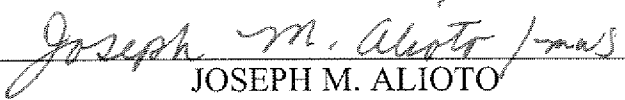
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GANNETT CO., INC. and
STEPHENS GROUP, INC.

1 Dated: March 7, 2007

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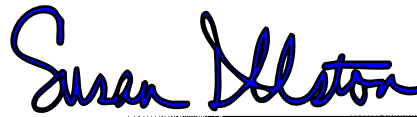
12 JOSEPH M. ALIOTO
13 DANIEL R. SHULMAN

14 Attorneys for Plaintiff
15 CLINTON REILLY

16 **ORDER**

17
18 IT IS SO ORDERED.

19
20 Dated: _____



21 HON. SUSAN ILLSTON
22 UNITED STATES DISTRICT COURT JUDGE
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